



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

October 14, 2008

Reply to  
Attn. of: ETPA-088

Ref: 02-085-DOT

Ms. Patricia Sullivan, Project Manager  
Federal Aviation Administration  
Airports Division – Alaskan Region  
222 W. 7<sup>th</sup> Avenue, #14  
Anchorage, Alaska 99513-7504

Dear Ms. Sullivan:

The U.S. Environmental Protection Agency (EPA), Region 10, has reviewed the **Draft Environmental Impact Statement (DEIS) for the Sitka Rocky Gutierrez Airport**, in Sitka, Alaska (CEQ No. 20080319) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309, independent of NEPA, specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policies and procedures, we evaluate the document's adequacy in meeting NEPA requirements.

The DEIS analyzes the proposed actions and alternatives for the Sitka Rocky Gutierrez Airport (SIT), and evaluates the environmental impacts associated those alternatives. According to the DEIS, the project is being developed to enhance safety, and not to increase capacity. This will be accomplished by improving runway safety area (RSA) for over and undershoots, reducing the potential for runway incursions, improving capability of aircraft to land or takeoff in inclement weather, maintaining structural integrity of the runway and preventing runway closure from wave overtopping and associated storm debris, and protecting land for current and future aviation uses.

The DEIS evaluates six projects proposed for the airport. These include: enhancements to the RSA; construction of a parallel taxiway; relocation of the seaplane pullout; installation of an Approach Lighting System (ALS); repairs and improvements to the airport seawall; and acquisition of property needed for airport uses. In addition, several other airport projects are planned or are currently underway, but are not part of this analysis. These projects are considered under cumulative effects analysis, however. The FAA has identified a preferred alternative for each of the five projects. Our comments primarily focus on those preferred alternatives.

EPA commends the FAA for the quality of analysis in the DEIS. We have appreciated the opportunity to review baseline studies and to participate in project briefings throughout the development of this DEIS. Airport safety is a concern of our agency and we support the FAA, as the lead Federal agency, in improving compliance with safety standards and requirements for

SIT. We look forward to continuing to collaborate with FAA on accomplishing this goal while incorporating environmental safeguards that are protective of human health and the environment.

Overall, EPA supports the analysis and conclusions presented in the DEIS. EPA does have concerns regarding impacts to subsistence users, as well as cost, wastewater program, and mitigation information presented in the DEIS. We also suggest that Table 2.6-1--2.6-6 be revised to reflect not only the impacts, but also the benefits, particularly regarding to safety gains, to provide a clear picture of both positive and negative impacts to the reader. We have rated the EIS, EC-2 (Environmental Concerns-Insufficient Information). Please see the enclosed detailed comments and our recommendations for information to be included in the final EIS and Record of Decision (ROD).

We appreciate the opportunity to review and provide comments on the DEIS for the SIT project. Our rating and a summary of our comments will be published in the Federal Register. Please find enclosed a copy of the rating system used in our review for your reference. If you have any questions regarding our comments, please do not hesitate to contact Jennifer Curtis of my staff at (907) 271-6324 or [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov), or me at (206) 553-1601.

Sincerely,

/s/

Christine B. Reichgott, Unit Manager  
NEPA Review Unit

**EPA DETAILED COMMENTS ON THE  
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)  
FOR THE SITKA ROCKY GUTIERREZ AIRPORT (SIT)**

**Parallel Taxiway and Other Preferred Alternatives**

The DEIS identifies Alternative 3—Partial Extension of the Parallel Taxiway to Charcoal Island as the preferred parallel taxiway alternative. EPA supports FAA in its decision to identify Alternative 3 as its preferred alternative as it has overall less impacts to water resources and quality, vegetation, wildlife and habitat and shoreline in Mermaid Cove, as well as less loss of waters of the U.S. than Alternative 2—Extension of the Parallel Taxiway to the Full Length of the Runway. It also falls under the cost threshold of \$30 million established by the FAA for safety improvements.

In general, EPA also supports the preferred alternatives identified in the DEIS for the seaplane pullout, approach lighting system, seawall, and land transfer for the reasons identified in the DEIS. EPA continues to have concerns regarding potential impacts to subsistence users for the land transfer alternative, particularly since the area being contemplated for transfer is utilized by subsistence practitioners, and will be transferred from federal to state jurisdiction. EPA believes it is important that FAA continue to work closely with the Sitka Tribe of Alaska and individual subsistence users to further clarify what those impacts will be and to mitigate those impacts to the extent possible.

*EPA recommends that additional discussion regarding potential impacts to subsistence users in relation to the land transfer preferred alternative be included in the final EIS, and mitigation for those impacts be identified, as appropriate.*

**Stormwater Pollution Prevention Plan, Compensatory Mitigation, and Mitigation Plan**

EPA recognizes that a complete, detailed Stormwater Pollution Prevention Plan (SWPPP) and Compensatory Mitigation Plan cannot be developed until the permitting or construction phase of the project. We believe, however, that important preliminary information should be incorporated into the final EIS and ROD to address concerns with stormwater management and compensatory mitigation. For instance, the following information could be identified in the EIS:

- Specific practices and structural controls to prevent stormwater discharges into Sitka Sound or airport freshwater bodies and wetlands.
- Proposed drainage, flow patterns, and receiving bodies for stormwater on aerial map of SIT.
- Proposed sites for construction equipment cleaning and wash down.

*EPA recommends that this information be included in the final EIS.*

Under Section 6.4, the DEIS lists candidate compensatory mitigation projects, with specific projects appearing in no particular order or priority. The new Compensatory Mitigation Rule (Final Rule for Compensatory Mitigation for Losses of Aquatic Resources,

April 10, 2008) does give priority to onsite mitigation and in-lieu fees (over permittee sponsored mitigation), however. The in-lieu fee project is currently placed at the end of the list.

*EPA recommends that the new rule and compensatory mitigation priority be discussed in this section, and that the in-lieu fee project be presented first in the list if any prioritization of the list is made.*

EPA appreciates the information presented in the DEIS regarding FAA's process to develop a mitigation plan, as well as the listing of potential mitigation activities and/or projects. According to the DEIS, there are numerous point source discharges into Sitka Sound that either are not properly permitted or experience exceedances of specific permit limits on occasion. Since impacts to the water quality of Sitka Sound is likely one of the unavoidable impacts of this project, it may be appropriate to evaluate actions to address some of these deficiencies with the various dischargers.

*EPA recommends that potential mitigation activities involving one or more of these point source discharges be considered during development of the mitigation plan.*

### **Total Cost for Each Alternative**

*EPA recommends costs for each alternative be discussed in terms of total cost, to include initial construction and lifecycle, for each project alternative for full public disclosure. EPA also recommends that FAA include a discussion of how costs are calculated under FAA requirements and the Clean Water Act Section 404(b)(1) guidelines.*

### **Recommended Edits**

Page ES.2-Fourth and fifth bullet are duplicative.

Page ES.11-EPA recommends that the National Pollution Discharge Elimination System (NPDES) program discussion include information regarding the delegation of the NPDES program to the State of Alaska. The schedule for the delegation can be viewed at: [http://www.dec.state.ak.us/water/npdes/Final\\_Application\\_2008/APDES\\_Schedule\\_May\\_2008.pdf](http://www.dec.state.ak.us/water/npdes/Final_Application_2008/APDES_Schedule_May_2008.pdf).

Page 2.9-Footer 4 is referenced, but the footnote itself is omitted.